C	ase 2:21-bk-18205-DS Doc 144 Filed Main Docume					
1	DAVID B. GOLUBCHIK (State Bar No. 18	85520)				
2	TODD M. ARNOLD (State Bar No. 221868) LEVENE, NEALE, BENDER, YOO & GOLUBCHIK L.L.P.					
3	2818 La Cienega Avenue Los Angeles, California 90034					
4	Telephone: (310) 229-1234 Facsimile: (310) 229-1244					
5	Email: dbg@lnbyg.com; tma@lnbyg.com					
6	Attorneys for Debtor and Debtor in Possess	ion				
7 8	UNITED STAT	TES BANKRUPTCY COURT				
9	CENTRAL DI	STRICT OF CALIFORNIA				
10	LOS A	ANGELES DIVISION				
11	In re:	Case No.: 2:21-bk-18205-DS				
12	CRESTLLOYD, LLC,	Chapter 11 Case				
13	Debtor and Debtor in Possession.	NOTICE OF MOTION AND MOTION FOR AN ORDER:				
14 15		(1) APPROVING THE SALE OF THE DEBTOR'S <u>PERSONAL</u> PROPERTY FREE AND				
16		CLEAR OF ALL LIENS, CLAIMS, ENCUMBRANCES, AND INTERESTS;				
17		(2) WAIVING THE FOURTEEN-DAY STAY PERIOD SET FORTH IN BANKRUPTCY RULE				
18		6004(h); AND (3) PROVIDING RELATED RELIEF				
19		Hearing:				
20		Date: March 18, 2022 Time: 11:00 a.m.				
21		Place: Courtroom 1639				
22		255 E. Temple St. Los Angeles, CA 90012				
23 24		VIA ZOOMGOV ONLY				
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- (1) pursuant to 11 U.S.C. §§ 363(b) and (f), approving the sale of the Debtor's miscellaneous personal property currently being stored at 944 Airole Way, Los Angeles, CA 90077 (the "Property") to Armen Topachikyan free and clear of any and all liens, claims, encumbrances, and interests, for a sale price of \$10,000;
- (2) waiving the 14-day stay period set forth in Rule 6004(h) of the Federal Rules of Bankruptcy Procedure ("<u>FRBP</u>") to enable the sale of the Property to close as quickly as possible; and
  - (3) providing such other relief as is appropriate under the circumstances.

In summary, in connection with inventorying the assets of the estate, the Debtor discovered that there remain certain miscellaneous appliances in storage at the Property. The appliances have not been used for the Property and are not part of the Property. However, the appliances are bulky and the estate would incur costs associated with removing and storing such items. As a result, the Debtor reached an agreement for the Buyer to purchase such personal property for a fixed price of \$10,000 and the Buyer has agreed to remove such property prior to the close of escrow for the Property, which is scheduled to occur by March 21, 2022. The Debtor believes that the terms of the agreement with Buyer are fair and reasonable since it will result in funds for the estate would the expense associated with removal and storage of such property. In addition, the Debtor believes that the value of the assets and the short time frame needed to remove them does not warrant an auction and overbid process, which prompted the Debtor to file the Motion.

PLEASE TAKE FURTHER NOTICE that, pursuant to Rule 6004-1(c)(3) of the Local Bankruptcy Rules (the "LBR"), the Debtor provides the following information regarding the proposed sale of the Real Property:

• Name of Buyer: Armen Topachikyan.

1	Asset to Be Sold: Miscellaneous appliances in storage and not
2	utilized in the Property, as descried in <b>Exhibit "A"</b> to the Motion.
3	Terms and Conditions of the Proposed Sale:
4	o <u>Purchase Price:</u> \$10,000.00.
5	o <u>Removal:</u> Upon approval of the sale, Buyer will pay
6	\$10,000 to the Debtor and will be responsible for the removal of the
7	personal property assets, which will be removed prior to the close of
8	escrow of the sale of the Property.
9	o <u>Contingencies:</u> None, other than approval of the sale
10	pursuant to an order of the Court.
11	• <u>Condition of Asset/Property:</u> "As-is" without warranty of any
12	kind.
13	• <u>Free and Clear:</u> As discussed above, the Property will be sold free
14	and clear of any and all liens, claims, encumbrances, and interests.
15	PLEASE TAKE FURTHER NOTICE that the Sale Motion is based upon (1) 11
16	U.S.C. §§ 105(a), 363(b), (f), and (m), FRBP 2002 and 6004, (2) any applicable LBRs, (3) the
17	Memorandum of Points and Authorities and Declarations in support of the Sale Motion, as well as the
18	exhibits thereto (together, the "Memorandum, Declarations, and Exhibits"), which Memorandum,
19	Declarations, and Exhibits are attached to the Sale Motion, (4) this notice of the Sale Motion (the
20	"Notice"), (5) all other evidence duly admitted by the Court in connection with consideration of the
21	Sale Motion, (6) the record in this case, and (7) the arguments and statements of counsel to be made
22	at the hearing on the Sale Motion.
23	PLEASE TAKE FURTHER NOTICE that any party that wants to obtain a full copy of
24	the Sale Motion, and its annexed Memorandum, Declarations, and Exhibits, can do so by making a
25	request, in writing, to the Debtor's counsel, whose contact information is set forth on the first page of
26	this Notice.
27	PLEASE TAKE FURTHER NOTICE that, pursuant to LBR 9013-1(f) and the Bid
28	Procedures Orders, any opposition to the Sale Motion must (1) be in writing and include all reasons

C	Case 2:21-bk-18205-DS Doc 144 Filed 03/08/22 Entered 03/08/22 17:26:29 Desc Main Document Page 4 of 34	
1	and evidence in support of the opposition and (2) be filed and served on the United States Trusted	e
2	and counsel for the Debtor by no later than March 15, 2022 at 12:00 p.m. (Pacific Time).	
3	PLEASE TAKE FURTHER NOTICE that the Court may deem the failure of any party	y
4	to file a timely opposition to the Sale Motion to constitute consent to the granting of the Sale Motion	1
5	and the relief requested therein.	
6	WHEREFORE, the Debtor respectfully requests that this Court enter a Sale Order	r
7	granting the Sale Motion and providing the relief requested in paragraphs (1) through (3) of the above	<del>)</del>
8	Notice and grant such further and additional relief as the Court deems just and proper.	
9	Dated: March 8, 2022 CRESTLLOYD, LLC	
10	/s/ David B. Golubchik	
11	DAVID B. GOLUBCHIK TODD M. ARNOLD	
12	LEVENE, NEALE, BENDER, YOO	
13	& GOLUBCHIK L.L.P. Attorneys for Debtor and Debtor in Possession	
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### MEMORANDUM OF POINTS AND AUTHORITIES

### STATEMENT OF FACTS

I.

- 1. On October 26, 2021 (the "<u>Petition Date</u>"), the Debtor commenced its bankruptcy case by filing a voluntary petition under Chapter 11 of the Bankruptcy Code. The Debtor is operating its estate and managing its financial affairs as a debtor in possession pursuant to Sections 1107 and 1108.
- 2. The Debtor's primary asset is the residential property that it developed, which is located at 944 Airole Way, Los Angeles, CA 90077 ("Property"). The Property is one of the finest pieces of real property in America. The Property is situated on an approximately four-acre Bel Air promontory, featuring the best views of Los Angeles. A moat that encompasses the Property gives the impression that it's floating on water.
- 3. The Debtor has completed an auction of the Property and proceeding to seek a confirmation of the sale through a concurrently filed sale motion (the "<u>Property Sale Motion</u>"). In the interest of efficiency, by this reference, the Debtor incorporates the factual background and discussion set forth in the Property Sale Motion.
- 4. Separate and apart for the Property, the Debtor, under management of its current manager, discovered certain miscellaneous appliances in storage at the Property (the "Personal Property"). The appliances have not been used for the Property and are not part of the Property. However, the appliances are bulky and the estate would incur costs associated with removing and storing such items, all of which has to occur prior to the close of escrow of the Property (scheduled for March 21, 2022).
- 5. The Debtor contacted numerous parties to see if anyone would be interested in purchasing the Personal Property. The Debtor reached an agreement ("Agreement") with Armen Topachikyan ("Buyer") for the Buyer to purchase such Personal Property for a fixed price of \$10,000 and the Buyer has agreed to remove such property prior to the close of escrow for the Property, which is scheduled to occur by March 21, 2022. A true and correct copy of the Agreement with the Buyer is attached hereto as **Exhibit "A"**.

- 6. The Debtor believes that the terms of the agreement with Buyer are fair and reasonable since it will result in funds for the estate would the expense associated with removal and storage of such property. In addition, the Debtor believes that the value of the assets and the short time frame needed to remove them does not warrant an auction and overbid process, which prompted the Debtor to file the Motion.
- 7. The Debtor also conducted a UCC search, a true and correct copy of which is attached hereto as **Exhibit "B"**. According to the UCC search, no secured claims are asserted with respect to the personal property assets.

### II. LEGAL ARGUMENT

### A. THE COURT SHOULD APPROVE THE SALE OF THE PERSONAL PROPERTY TO THE BUYER.

### 1. <u>THE DEBTOR HAS OR WILL HAVE COMPLIED WITH ALL APPLICABLE NOTICE REQUIREMENTS.</u>

Section 363(b)(1) provides that the Debtor, "after notice and a hearing, may use, sell or lease, other than in the ordinary course of business, property of the estate." 11 U.S.C. § 363(b)(1). Section 102(1) defines "after notice and a hearing" as after such notice as is appropriate in the particular circumstances, and such opportunity for hearing as is appropriate in the particular circumstances. 11 U.S.C. § 102(1)(A).

FRBP 6004(a) provides, in pertinent part, that notice of a proposed sale not in the ordinary course of business must be given pursuant to FRBP 2002(a)(2), (c)(1), (i) and (k), and, if applicable, in accordance with Section 363(b)(2). Fed.R.Bankr.P. 6004(a). FRBP 2002(a)(2) requires at least 21 days' notice by mail of a proposed sale of property of the estate other than in the ordinary course of business, unless the Court for cause shown shortens the time or directs another method of giving notice. Fed.R.Bankr.P. 2002(a)(2). Here, the Court shortened the notice period pursuant to the Bid Procedures Orders, and the Debtor complied with the Bid procedures by filing and serving the Notice of the Sale Motion and the Sale Motion on Mach 8, 2022. FRBP 2002(c)(1) requires that the notice of a proposed sale include the date, time and place of any public sale, the

### Case 2:21-bk-18205-DS Doc 144 Filed 03/08/22 Entered 03/08/22 17:26:29 Desc Main Document Page 7 of 34

terms and conditions of any private sale, and the time fixed for filing objections. It also provides that the notice of sale or property is sufficient if it generally describes the property. Fed. R. Bankr. P. 2002(c)(1). Because the Debtor believes this Motion is related to the real property sale proceeding, the Debtor requests that similar procedures be applicable herein. FRBP 2002(k) requires that the notice be given to the United States Trustee. Fed.R.Bankr.P. 2002(k).

In addition, LBR 6004-1 requires that the notice contain the information specified in LBR 6004-1(c)(3) and that an additional copy of the notice be submitted to the Clerk of the Bankruptcy Court together with a Form F 6004-2.NOTICE.SALE at the time of filing for purposes of publication. LBR 6004-1(c)(3) and (f).

The Debtor has or will have complied with all of the above provisions of the Bankruptcy Code, the FRBP and the LBR. The Debtor has complied with FRBP 6004(a) and 2002(a)(2), (c)(1), (i) and (k), as well as LBR 6004-1(c)(3), as far as practicable under the circumstances, because the Notice of the Sale Motion includes all of the required information set forth above, including, without limitation, the date, time and place of the hearing on the Sale Motion to approve the proposed sale of the Personal Property to the Buyer, the deadline for objecting to the Sale Motion, and related deadlines, and the Notice of the Sale Motion has been served on the Office of the United States Trustee, the Debtor, all of the Debtor's known creditors, and all parties requesting special notice. Further, this Sale Motion and its annexed Memorandum, Declaration, and Exhibits will be served on the Office of the United States Trustee, the Debtor, and all parties requesting special notice. Additionally, the Notice of the Sale Motion advises parties in interest how and where to obtain a full copy of this Motion and its annexed Memorandum, Declaration, and Exhibits.

Further, as required by LBR 6004-1(f), concurrently with the filing hereof, the Debtor submitted an additional copy of the Notice of the Sale Motion, which includes required information about the proposed sale of the Property, with the Clerk of the Bankruptcy Court together with a Form F 6004-2.NOTICE.SALE for purposes of publication.

Based on the foregoing, all applicable notice requirements have been satisfied.

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# THE SALE OF THE PERSONAL PROPERTY TO THE BUYER SHOULD BE APPROVED, BECAUSE GOOD BUSINESS REASONS FOR THE SALE EXIST, THE PURCHASE PRICE FOR THE PROPERTY IS FAIR AND REASONABLE, AND THE PROPOSED SALE IS IN THE BEST INTERESTS OF THE ESTATE AND ITS CREDITORS.

As a general matter, a court considering a motion to approve a sale under Section 363(b) should determine from the evidence presented before it that a "good business reason" exists to grant such a motion. *In re Lionel Corp.*, 722 F.2d 1063, 1071 (2d Cir. 1983). In addition, the court must further find that the sale is in the best interest of the estate. To make this determination, the Court should consider whether:

- (1) the sale is fair and reasonable, *i.e.*, the price to be paid is adequate;
- (2) the property has been given adequate marketing;
- (3) the sale is in good faith, *i.e.*, there is an absence of any lucrative deals with insiders, and
- (4) adequate notice has been provided to creditors.

In re Wilde Horse Enterprises, Inc., 136 B.R. 830, 841-2 (Bankr. C.D. Cal. 1991); In re The Landing, 156 B.R. 246, 249 (Bankr. E.D. Mo. 1993); In re Mama's Original Foods, Inc., 234 B.R. 500, 502-505 (C.D. Cal. 1999). Here, the proposed sale of the Personal Property to the Buyer satisfies each of these requirements.

#### a. Sound Business Purpose.

The Ninth Circuit Bankruptcy Appellate Panel in *Walter v. Sunwest Bank (In re Walter)*, 83 B.R. 14, 19 (B.A.P. 9th Cir. 1988) has adopted a flexible case-by-case test to determine whether the business purpose for a proposed sale justifies disposition of property of the estate under Section 363(b). The facts pertaining to the sale at issue here amply substantiate the Debtor's business decision that the contemplated sale of the Personal Property to the Buyer serves the best interests of the estate and merits the approval of this Court.

As noted above, the Personal Property is stored at the Property, which is scheduled to be sold with a closing of March 21, 2022. The Debtor has no use for the Personal Property. However, to retain the Personal Property, the Debtor would have to incur costs associated with removing it from the Property and storing it. Considering the relatively nominal value of the Personal Property,

the Debtor believes expending funds for this purpose is not prudent. Instead, the Debtor has secured a third party that will not only remove all the Personal Property prior to close of escrow, but will also pay to the estate \$10,000 for an "as is" sale of the Personal Property. Under the circumstances, the Debtor believes that this is a fair and reasonable solution and supported by a sound business purpose.

### b. Fair and Reasonable Price.

In order for a sale to be approved under Section 363(b), the purchase price must be fair and reasonable. *See generally, In re Canyon Partnership*, 55 B.R. 520 (Bankr. S.D. Cal. 1985). The trustee is given substantial discretion in this regard. *Id.* In addition, Courts have broad discretion with respect to matters under section 363(b). *See Big Shanty Land Corp. v. Comer Properties, Inc.*, 61 B.R. 272, 278 (Bankr. N.D. Ga. 1985). In any sale of estate assets, the ultimate purpose is to obtain the highest price for the property sold. *Wilde Horse Enterprises, Inc.*, 136 B.R. at 841 (*citing In re Chung King, Inc.*, 753 F.2d 547 (7<sup>th</sup> Cir. 1985)), *In re Alpha Industries, Inc.*, 84 B.R. 703, 705 (Bankr. Mont. 1988).

The Debtor submits that, under the circumstances, the proposed sale price for the Personal Property is fair and reasonable. The Personal Property consists of used appliances which, the Debtor believes, have relatively nominal value in the marketplace. The Debtor does not have the luxury of time to market and sell the Personal Property. Moreover, any efforts to market and sell the Personal Property would likely require removal of the Personal Property from the Property by March 21, 2022 and incurring costs associated with storage. The Debtor believes that there would be no net benefit to the estate associated with such efforts. On the other hand, the proposed sale provides a net benefit to the estate of \$10,000, which includes timely removal of the Personal Property prior to escrow closing at no additional cost to the estate.

#### c. Adequate Marketing.

For the reasons discussed above, the Debtor believes that there is no time for extensive marketing efforts and that the cost of such efforts are not likely to result in a net benefit to the estate. On the other hand, the proposed sale results in an inflow of \$10,000 to the estate without a need to incur fees and costs associated with vacating the Property at close of escrow.

### d. Good Faith.

When a Bankruptcy Court authorizes a sale of assets pursuant to Section 363(b)(1), it is required to make a finding with respect to the "good faith" of the purchaser. *In re Abbotts Dairies*, 788 F.2d at 149. Such a procedure ensures that Section 363(b)(1) will not be employed to circumvent creditor protections. *Id.* at 150. With respect to the Debtor's conduct in conjunction with the proposed sale of the Property, the good faith requirement focuses principally on whether there is any evidence of "fraud, collusion between the purchaser and other bidders or the trustee, or an attempt to take grossly unfair advantage of other bidders." *Abbotts Dairies*, 788 F.2d at 147; *Wilde Horse Enterprises*, 136 B.R. at 842.

Here, the Debtor or its manager has no connection with the Buyer. Buyer was referred to the Debtor through one of the appliance vendors. Because the Buyer has no affiliation with the Debtor and is not an "insider" of the Debtor, as that term is defined in Section 101(31), the Debtor submits that there has been no fraud or collusion in connection with the proposed sale of the Personal Property. Therefore, the good faith requirement has been satisfied.

### e. Accurate and Reasonable Notice.

The purpose of the notice is to provide an opportunity for objections and hearing before the Court if there are objections. *In re Karpe*, 84 B.R. 926, 930 (Bankr. M.D.Pa. 1988). A notice is sufficient if it includes the terms and conditions of the sale and if it states the time for filing objections. *Id*.

As set forth above, the Debtor has or will have complied with all of the applicable notice provisions of the Bankruptcy Code, the FRBP and the LBR. Thus, the Notice of the Sale Motion (and proposed sale of the Personal Property) should be deemed adequate, accurate, and reasonable by the Court.

# B. THE COURT SHOULD APPROVE THE SALE OF THE PERSONAL PROPERTY FREE AND CLEAR OF ALL LIENS, CLAIMS, ENCUMBRANCES, AND INTERESTS.

The Court has the power to authorize the sale of property free and clear of liens, claims, or interests. *See* 11 U.S.C. § 363(f); *In re Gerwer*, 898 F.2d 730, 733 (9th Cir. 1990).

Section 363(f) permits a sale of property "free and clear of any interest in such property

C	ase 2:21-bk-18205-DS	Doc 144 Filed 03/08/22 Entered 03/08/22 17:26:29 Desc Main Document Page 11 of 34			
1	of an entity other than the	estate" if any one of the following five conditions is met:			
2 3	(1)	applicable nonbankruptcy law permits sale of such property free and clear of such interest;			
4	(2)	such entity consents;			
5	(3)	such interest is a lien and the price at which such			
6		property is to be sold is greater than the aggregate value of all liens on such property;			
7	(4)	such interest is in bona fide dispute; or			
8	(5)	such entity could be compelled, in a legal or equitable proceeding, to accept a money satisfaction of such			
10		interest.			
11	11 U.S.C. § 363(f). Sect	ion 363(f) is written in the disjunctive; thus, satisfaction of any one of the			
12	five conditions is sufficie	nt to sell property free and clear of liens. See e.g., Citicorp Homeowners			
13	Services, Inc. v. Elliot (In re Elliot), 94 B.R. 343, 345 (Bankr. E.D. Pa. 1988); Mutual Life Ins. Co. of				
14	New York v. Red Oak Farms, Inc. (In re Red Oak Farms, Inc.), 36 B.R. 856, 858 (Bankr. W.D. Mo.				
15	1984).				
16	In this case, as evidenced by a UCC search, a copy of which is attached hereto as <b>Exhibit</b>				
17	"B", there are no secured claims asserted with respect to the Personal Property. As a result, a sale				
18	free and clear of all such i	nterests is appropriate.			
19					
20	C. THE COUR	T SHOULD WAIVE THE 14-DAY STAY PERIOD SET FORTH IN			
21	<b>BANKRUPT</b>	CY RULES 6004(h).			
22	FRBP 6004(h	) provides, among other things, that an "order authorizing the sale of			
23	property is stayed un	til the expiration of 14 days after entry of the court order, unless the court			
24	orders otherwise." Fed.R.	Bankr.P. 6004(h).			
25	Here, the clos	ing of the Property sale is scheduled for March 21, 2022 and the hearing on			
26	the Sale Motion is scheduled for March 18, 2022. It is critical that the Personal Property assets be				
27	removed from the Propert	y prior to close of escrow, which would be less than 14 days from the date			

of the hearing, assuming that an order is entered the same day. For this to be achieved, the Debtor

C	ase 2:21-bk-18205-DS
1	requests that the Court waive the stay under FRBP 6004(h) and that the sale order be effective
2	immediately upon entry.
3	III.
4	<u>CONCLUSION</u>
5	WHEREFORE, the Debtor respectfully requests that this Court enter a Sale Order
6	granting the Sale Motion and providing the relief requested in paragraphs (1) through (3) of the above
7	Sale Motion and granting such further and additional relief as the Court deems just and proper.
8	
9	Dated: March 8, 2022 CRESTLLOYD, LLC
10	<u>/s/ David B. Golubchik</u> DAVID B. GOLUBCHIK
11	TODD M. ARNOLD
12	LEVENE, NEALE, BENDER, YOO & GOLUBCHIK L.L.P.
13	Attorneys for Debtor and Debtor in Possession
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### **DECLARATION OF LAWRENCE R. PERKINS**

I, LAWRENCE R. PERKINS, hereby declare as follows:

- 1. I am over 18 years of age. I have personal knowledge of the facts set forth below and, if called to testify, would and could competently testify thereto.
- 2. I am the Founder and Chief Executive Officer of SierraConstellation Partners LLC ("SCP") and have nearly 20 years of management consulting and advisory experience with companies undergoing transition. I have enhanced business performance for numerous companies on projects ranging from interim management, profit improvement and working capital management to strategic planning and transaction execution.
- 3. I have served in a variety of senior level positions including Financial Advisor, Strategic Consultant, Investment Banker, Financial Executive, and Crisis Manager to numerous middle market companies and believe that I am particularly skilled at assisting clients through challenging situations.
- 4. Prior to founding SCP, I was a Senior Managing Director and Regional Leader of a national consulting firm where he was responsible for business development, marketing, staffing, and general management of the firm's western region. I joined the firm in 2010 when it acquired El Molino Advisors, a company I founded in January 2007 and led as the CEO.
- 5. I began my career in the strategic consulting group of Arthur Andersen after graduating from the University of Southern California Marshall School of Business. I am currently on the board of several non-profits, and two corporate boards, and am a member of the Young Presidents Organization.
  - 6. SCP is the current Non-Member Manager of the Debtor.
- 7. On October 26, 2021 (the "<u>Petition Date</u>"), the Debtor commenced its bankruptcy case by filing a voluntary petition under Chapter 11 of the Bankruptcy Code. The Debtor is operating its estate and managing its financial affairs as a debtor in possession.
- 8. The Debtor's primary asset is the residential property that it developed, which is located at 944 Airole Way, Los Angeles, CA 90077 ("Property"). The Property is one of the finest pieces of real property in America. The Property is situated on an approximately four-acre Bel Air

promontory, featuring the best views of Los Angeles. A moat that encompasses the Property gives the impression that it's floating on water.

- 9. The Debtor has completed an auction of the Property and proceeding to seek a confirmation of the sale through a concurrently filed sale motion (the "<u>Property Sale Motion</u>"). My declaration in support thereof is attached to the Property Sale Motion. In the interest of efficiency, by this reference, I hereby incorporate the factual background and discussion set forth in my declaration in support of the Property Sale Motion.
- 10. Separate and apart for the Property, we discovered certain miscellaneous appliances in storage at the Property (the "Personal Property"). The appliances have not been used for the Property and are not part of the Property. However, the appliances are bulky and the estate would incur costs associated with removing and storing such items, all of which has to occur prior to the close of escrow of the Property (scheduled for March 21, 2022).
- 11. The Personal Property consists of used appliances which, I believe, have relatively nominal value in the marketplace. I believe that the Debtor does not have the luxury of time to market and sell the Personal Property. Moreover, I believe that any efforts to market and sell the Personal Property would likely require removal of the Personal Property from the Property by March 21, 2022 and incurring costs associated with storage. I therefore believe that there would be no net benefit to the estate associated with such efforts. On the other hand, the proposed sale provides a net benefit to the estate of \$10,000, which includes timely removal of the Personal Property prior to escrow closing at no additional cost to the estate.
- 12. SCP contacted numerous parties to see if anyone would be interested in purchasing the Personal Property. Fortunately, the Debtor reached an agreement ("Agreement") with Armen Topachikyan ("Buyer") for the Buyer to purchase such Personal Property for a fixed price of \$10,000 and the Buyer has agreed to remove such property prior to the close of escrow for the Property, which is scheduled to occur by March 21, 2022. A true and correct copy of the Agreement with the Buyer is attached hereto as **Exhibit "A"**.
- 13. I believe that the terms of the agreement with Buyer are fair and reasonable since it will result in funds for the estate would the expense associated with removal and storage of such

С	ase 2:21-bk-18205-DS Doc 144 Filed 03/08/22 Entered 03/08/22 17:26:29 Desc Main Document Page 15 of 34
1	property. In addition, I believe that the value of the assets and the short time frame needed to remove
2	them does not warrant an auction and overbid process, which prompted the Debtor to file the Motion.
3	14. To the best of my knowledge, neither the Debtor nor SCP has any connection with
4	the Buyer. Buyer was referred to the Debtor through one of the appliance vendors. Because the
5	Buyer has no affiliation with the Debtor and is not an "insider" of the Debtor, I submit that there has
6	been no fraud or collusion in connection with the proposed sale of the Personal Property, and that we
7	are proceeding with a sale in good faith.
8	15. The Debtor also conducted a UCC search, a true and correct copy of which is
9	attached hereto as Exhibit "B". According to the UCC search, no secured claims are asserted with
10	respect to the personal property assets.
11	I declare and verify under penalty of perjury that the foregoing is true and correct to the
12	best of my knowledge.
13	Executed on this 8 <sup>th</sup> day of March 2022, at Los Angeles, California
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15	LAWRENCE R. PERKINS
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Case 2:21-bk-18205-DS Doc 144 Filed 03/08/22 Entered 03/08/22 17:26:29 Desc Main Document Page 16 of 34

### **EXHIBIT** "A"

ARMEN TOPACHIKYAN 818-601-0788 ATOPACHIKYAN@YAHOO.COM 1. 2 x True Residential 15 Inch Clear Ice Maker 2. True Residential 24 Inch Undercounter Refrigerator 3. Subzero Undercounter Refrigerator - Panel Ready 4. Used SCIROCCO DOWNDRAFT 5. Used SCIROCCO DOWNDRAFT 6. Used Thermaodor Oven with Warming drawer 7. Used MIELE HOOD LINER 8. Used 24" Wine cooler 9. GE 24" double drawer refrigerator 10. 2 Kitchen Sinks 11. Open Toilet Seat WE WILL BE PAYING YOU \$10,000 FOR **TOTAL OF ITEMS** 

Case 2:21-bk-18205-DS Doc 144 Filed 03/08/22 Entered 03/08/22 17:26:29 Desc Main Document Page 18 of 34

# **EXHIBIT** "B"

State



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California Secretary of State 1500 11th Street Sacramento, California 95814 (916) 653-3516 For Office Use Only

-FILED-

File #: U220171817222 Date Filed: 3/8/2022

Requester Information:

Contact Name

Organization Name

Phone Number Email Address

Address 2020 HURLEY WAY

SACRAMENTO, CA 95825

**CLAS INFORMATION SERVICES** 

Search Information:

Request Type Search request only

Search Type: Debtor Search

Individual or Organization: Organization

Organization name: CRESTLLOYD, LLC

City: State:

Start Date:

Include lapsed filings on search response:

Yes



### **Secretary of State**

Business Programs Division 1500 11th Street, Sacramento, CA 95814

CLAS INFORMATION SERVICES 2020 HURLEY WAY SACRAMENTO. CA 95825

Request Date: 03/08/20

03/08/2022 10:25 AM

Information

Request No.: U220171817222

Certification No.: 012513517

### LIEN SEARCH CERTIFICATE

The search results herein reflect only the specific information requested. The results of this Debtor search will not reflect variances of this name. If the Debtor is known under other personal names, trade names, business entities, or addresses, separate searches of these names will have to be requested and conducted. The Secretary of State, his officers and agents disclaim any and all liability for claims resulting from other filings on which the name of the Debtor can be found in any other form than which was requested.

### Search Criteria:

Debtor Organization: CRESTLLOYD, LLC

Request Type: Lien Information Request (UCC 11)
All Records On File (Lapsed and Unlapsed), List Only

Lien Listing

Lien File No.: 167541207811 Filed: 08/11/2016 01:04 PM Lapse: 08/11/2021 11:59 PM

Lien Type: Financing Statement

Debtor(s): CRESTLLOYD, LLC A CALIFORNIA LIMITED LIABILITY COMPANY, 8981 WEST SUNSET

BOULEVARD #303, WEST HOLLYWOOD, CA 90069

Secured Party(s): FIRST CREDIT BANK, A CALIFORNIA BANKING CORPORATION, 9265 SUNSET

BOULEVARD, WEST HOLLYWOOD, CA 90069

Amendment - Termination

Amendment No.: 1976990786 Filed: 02/25/2019 09:14 AM

System Amendment - Lapse

Amendment No.: U210074695830 Filed: 08/12/2021 01:00 AM

Lien File No.: 167542523621 Filed: 08/19/2016 10:53 AM Lapse: 08/19/2021 11:59 PM

Lien Type: Financing Statement

Debtor(s): CRESTLLOYD, LLC, A CALIFORNIA LIMITED LIABILITY COMPANY, 8981 WEST SUNSET

BOULEVARD #303, WEST HOLLYWOOD, CA 90069

Secured Party(s): FIRST CREDIT BANK, A CALIFORNIA BANKING CORPORATION, 9255 WEST SUNSET

BOULEVARD, WEST HOLLYWOOD, CA 90069

System Amendment - Lapse

Amendment No.: U210077198737 Filed: 08/20/2021 01:00 AM

Lien File No.: U200018754836 Filed: 09/11/2020 01:08 PM Lapse: 09/11/2025 11:59 PM

Lien Type: Financing Statement

Debtor(s): CRESTLLOYD, LLC, 8981 W. SUNSET BLVD, WEST HOLLYWOOD, CA 90069

Secured Party(s): MIKE FIELDS BRONZES LLC, 2715 E. 36TH, APT 6203 SPOKANE, WA 99223

Certification No.: 012513517

Page Count: 2

I, Shirley N. Weber, Ph.D., Secretary of State, do hereby certify that the above listing is a record of all presently active financing statements, tax liens, attachment liens and judgment liens, including any change documents relating to them, which name the referenced debtor, subject to any above-stated search qualifiers and are on file in my office as of **03/02/2022 11:59 PM**.



**IN WITNESS WHEREOF**, I execute this certificate and affix the Great Seal of the State of California on March 8, 2022.

Shirley N. Weber, Ph.D.

Secretary of State





# STATE OF CALIFORNIA Office of the Secretary of State, Alex Padilla UCC FINANCING STATEMENT (UCC 1)

California Secretary of State 1500 11th Street Sacramento, California 95814 (916) 653-3516 For Office Use Only

-FILED-

File #: U200018754836 Date Filed: 9/11/2020

Submitter Information:

Contact Name
Organization Name
Phone Number

Email Address

Address

JEFFREY H. LERMAN, ESQ. LERMAN LAW PARTNERS, LLP

(415) 454-0455

JEFF@LERMANLAW.COM

802 B STREET

SAN RAFAEL, CA 94901

				m			

Debtor Name	Mailing Address
CRESTLLOYD, LLC	8981 W. SUNSET BLVD WEST HOLLYWOOD, CA 90069

#### Secured Party Information:

Secured Party Name	Mailing Address
MIKE FIELDS BRONZES LLC	2715 E. 36TH APT 6203 SPOKANE, WA 99223

Indicate how documentation of Collateral is provided:

Entered as Text

#### Description:

This constitutes actual and constructive notice.

Debtor currently holds as a bailment the sculpture known as "Unity" (2019, composite, white finish), whose sole creator and sole owner is and at all times has been Secured Party. Debtor does not have, and has not at any time had, any ownership rights whatsoever in Unity. As of the date hereof, Debtor holds Unity solely as a bailment, and Unity is currently located at the real property commonly known as "The One", 944 Airole Way, Los Angeles CA 90077 ("Real Property"). Unity is not and has never been furniture, a fixture, or otherwise affixed to or in any way a part of the Real Property; is not and has never been used in the operation or occupancy of the Real Property; and is not and has never been the personal property of Debtor.

The rights and obligations of Debtor as Bailee and Secured Party as Bailor with respect to Unity are set forth in that certain private Artwork Display Agreement between Debtor and Secured Party dated January 27, 2020.

Indicate if Collateral is held in a Trust or is being administered by a Decedent's Personal Representative:

Not Applicable

Select an alternate Financing Statement type:

Not Applicable

Select an additional alternate Financing Statement type:

Not Applicable

Select an alternative Debtor/Secured Party designation for this Financing Statement:

Bailee/Bailor

Optional Filer Reference Information:

This Financing Statement is to be filed in the real estate records (if applicable).

This Financing Statement:

Desc

	Main Document	Page 23 of 34
Covers timber	r to be cut	
Covers as-ex	tracted Collateral	
Is filed as a f	ixture filing	
Name and address of a	Record Owner of real estate described above (if Debt	or does not have a record interest):
Description of real esta The real property 4369-026-021)		as "The One", 944 Airole Way, Los Angeles, CA 90077 (APN
Miscellaneous Informa	ion:	
Search to Reflect:		
Order a Sear	ch to Reflect	

Filed 03/08/22 Entered 03/08/22 17:26:29

Doc 144

Case 2:21-bk-18205-DS

PROOF OF SERVICE OF DOCUMENT 1 2 I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is: 2818 La Cienega Avenue, Los Angeles, CA 90034 3 A true and correct copy of the foregoing document entitled NOTICE OF MOTION AND MOTION FOR AN ORDER: (1) APPROVING THE SALE OF THE DEBTOR'S PERSONAL PROPERTY FREE AND 4 CLEAR OF ALL LIENS, CLAIMS, ENCUMBRANCES, AND INTERESTS; (2) WAIVING THE FOURTEEN-DAY STAY PERIOD SET FORTH IN BANKRUPTCY RULE 6004(h); AND (3) PROVIDING **RELATED RELIEF** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below: 6 1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On March 8, 2022, I checked the CM/ECF docket for this bankruptcy case or 8 adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below: 9 kandrassv@swelawfirm.com. Kvra E Andrassv 10 Igarrett@swelawfirm.com;gcruz@swelawfirm.com;jchung@swelawfirm.com **Todd M Arnold** tma@Inbyg.com 11 Jerrold L Bregman jbregman@bg.law, ecf@bg.law Marguerite Lee DeVoll mdevoll@watttieder.com, zabrams@watttieder.com 12 dgabai@danninggill.com. dgabai@ecf.courtdrive.com Danielle R Gabai tmg@jmbm.com, Thomas M Geher 13 bt@jmbm.com;fc3@jmbm.com;tmg@ecf.inforuptcy.com David B Golubchik dbg@lnbyg.com, stephanie@lnbyb.com 14 James Andrew Hinds jhinds@hindslawgroup.com;mduran@hindslawgroup.com, mduran@hindslawgroup.com 15 Robert B Kaplan rbk@jmbm.com Jane G Kearl jkearl@watttieder.com 16 Jennifer Larkin Kneeland jkneeland@watttieder.com, zabrams@watttieder.com Michael S Kogan mkogan@koganlawfirm.com 17 Noreen.Madoyan@usdoj.gov Noreen A Madoyan Rvan D O'Dea rodea@shulmanbastian.com, lgauthier@shulmanbastian.com 18 Sharon Oh-Kubisch sokubisch@swelawfirm.com, gcruz@swelawfirm.com;1garrett@swelawfirm.com;jchung@swelawfirm.com 19 Ronald N Richards ron@ronaldrichards.com, 7206828420@filings.docketbird.com Victor A Sahn vsahn@sulmeverlaw.com. 20 pdillamar@sulmeyerlaw.com;pdillamar@ecf.inforuptcy.com;vsahn@ecf.inforuptcy.com;c blair@sulmeyerlaw.com;cblair@ecf.inforuptcy.com 21 wschumac@milbank.com, autodocketecf@milbank.com William Schumacher David Seror dseror@bg.law, ecf@bg.law 22 Zev Shechtman zshechtman@DanningGill.com, danninggill@gmail.com;zshechtman@ecf.inforuptcy.com 23 mshinderman@milbank.com. Mark Shinderman dmuhrez@milbank.com;dlbatie@milbank.com 24 Lindsey L Smith IIs@Inbyb.com, IIs@ecf.inforuptcy.com United States Trustee (LA) ustpregion16.la.ecf@usdoj.gov 25 Jessica Wellington jwellington@bg.law, ecf@bg.law 26 27

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Case	2:21-bk-18205-DS Doc 144 Filed 03/08/22 Entered 03/08/22 17:26:29 Desc Main Document Page 25 of 34						
1	2. <u>SERVED BY UNITED STATES MAIL</u> : On March 8, 2022, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true						
2 3	and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.						
4	Service information continued on attached page						
5	3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR						
6	EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on March 8, 2022, I served the following persons and/or entities by personal delivery, overnight mail						
7	service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight						
8	mail to, the judge <u>will be completed</u> no later than 24 hours after the document is filed.						
9	SERVED BY EMAIL						
10	Buyer Agent Hilton & Hyland/Stuart Vetterick  Buyer Advisors & Attorneys Michael G. Burke, mgburke@sidley.com						
11	257 North Cañon Drive, 2nd Floor Erica Meierhans, <u>erica.meierhans@fashionnova.com</u> Reception Melissa Morton, <u>mmorton@grfllp.com</u>						
12	Beverly Hills, CA 90210 Samuel A. Newman, <u>sam.newman@sidley.com</u> Email: <u>stuart@hiltonhyland.com</u>						
13	☐ Service information continued on attached page						
14	I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.						
15	March 8, 2022 Lourdes Cruz /s/ Lourdes Cruz						
16	Date Type Name Signature						
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28							
	This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.						

In re Crestlloyd, LLC Professionals Service List

File No.: 9562

The Beverly Hills Estates GREG LAPLANT Managing Director 8878 West Sunset Blvd. West Hollywood, CA 90069

Concierge Counsel
Anthony (Nino) Capobianco
Capobianco Law Offices, P.C.
41990 Cook Street, Bldg. F, Suite
2006
Palm Desert, CA 92211

Compass/Aaron Kirman Attn: Aaron Kirman 9378 Wilshire Blvd #200 Beverly Hills, CA 90212 Concierge Chad Roffers, Chairman 228 Park Avenue S PMB 70835 New York, NY 10003-1502 Case 2:21-bk-18205-DS

In re Crestlloyd, LLC RSN, Secured Creditors File No. 9562

Counsel For Receiver
Brutzkus Gubner Rozansky Seror
Weber LLP
David Seror/Jessica Wellington
21650 Oxnard Street, Suite 500
Woodland Hills, CA 91367

Los Angeles County Tax Collector PO Box 54110 Los Angeles, CA 90054

County of Los Angeles (Local Fire Prevention, Water Quality and Open Space Measure) c/o SCI Consulting Group 4745 Mangels Blvd. Fairfield, CA 94534

YOGI Securities Holdings, LLC Steve Oshins, Authorized Agent 1645 Village Center Circle, Ste. 170 Las Vegas, NV 89131

J&E Texture, Inc. Francisco Gonzalez, CEO 181 Exter Way Corona, CA 92882

JMS Air Conditioning and Appliance Services, Inc. Yosi Hesica, CEO 7640 Burnet Ave. Van Nuys, CA 91405

Powertek Electric, Inc. Mike Moshrefi, CEO 28364 S, Western Ave. #414 Rancho Palos Verdes, CA 90275

YOGI Securities Holdings, LLC c/o Daniel Wiesel, Esq. Wolf, Rifkin, Shapiro, Schulman & Rabkin, LLP 11400 W. Olympic Blvd., 9th Fl. Los Angeles, CA 90064-1582

Calgrove Rentals Inc. 21627 Roscoe Bl. Canoga Park, CA 91304 Doc 144 Filed 03/08/22 Entered 03/08/22 17:26:29 Desc Main Document Page 27 of 34

Debtor
Crestlloyd, LLC
c/o SierraConstellation Partners LLC
355 S. Grand Avenue Suite 1450
Los Angeles, CA 90071

County of Los Angeles (MRCA-Brush Fire Clear'g Dist #1) 200 North Main Street, 16th FI Los Angeles, CA 90012

Counsel to Hankey Capital
Jeffer Mangels Butler & Mitchell LLP
Neil C. Erickson
1900 Avenue of the Stars, 7th Floor
Los Angeles, CA 90067

Rolls Scaffold, Inc. Michael Rolls, CEO 11351 County Dr. Ste B Ventura, CA 93004

Calgrove Rentals Inc. Guadalupe Gomez, President 456 Glenoaks Blvd. San Fernando, CA 91340

City of Los Angeles Mike Feuer, City Attorney City Hall East, Suite 800 Los Angeles, CA 90012

Kennco Plumbing, Inc. Robert L. Kennedy, Jr., CEO 21366 Placerita Canyon Rd. Newhall, CA 91321

County of Los Angeles (Wildlife Corridor and Open Space Protection)/Clerk of the Governing Board, Mountains Recreation & Conservation Authority 5750 Ramirez Canyon Road Malibu, CA 90265

American Truck & Tool Rentals Inc./American Rental Tom Murray, CEO and President 88 W. Victoria St. Long Beach, CA 90805

BMC West LLC 3250 N. San Fernando Rd. Los Angeles, CA 90065 Noreen A Madoyan Office of the United States Trustee 915 Wilshire Blvd., Suite 1850 Los Angeles, CA 90017

County of Los Angeles (Wildlife Corridor and Open Space Protection) c/o SCI Consulting Group 4745 Mangels Blvd. Fairfield, CA 94534

Inferno Investment Inc. Attn: Julien Remillard, President 4-95 Kandahar, Mont Tremblant Quebec J8E 1E2, Canada

American Truck & Tool Rentals Inc./American Rentals c/o Caprenos Inc., Cindee Wood, Authorized Agent 4345 Murphy Canyon Road #200 San Diego, CA 92123

Hilldun Corporation Jeffrey D. Kapelman, CEO 225 West 35th St. New York, NY 10001

BMC West LLC David Filtman, CEO 4800 Falls of Neuse Rd., Ste. 400 Raleigh, NC 27609

Parquet By Dian Dima Efros, CEO 16601 S. Main St. Gardena, CA 90248

County of Los Angeles (Local Fire Prevention, Water Quality and Open Space Measure) Conejo Recreation and Park District 403 W Hillcrest Drive Thousand Oaks, CA 91360

Buchalter, APC Jeffrey S. Wruble 1000 Wilshire Blvd., Suite 1500 Los Angeles, CA 90017

Kennco Plumbing, Inc. Robert L. Kennedy, Jr., CEO 26575 Ruether Ave. Santa Clarita, CA 91350 Case 2:21-bk-18205-DS

Los Angeles County Tax Collector PO Box 54018 Los Angeles, CA 90054

MIKE FIELDS BRONZES LLC 2715 E. 36TH, APT 6203 SPOKANE, WA 99223

Doc 144 Filed 03/08/22 Entered 03/08/22 17:26:29 Desc Main Document Page 28 of 34 Los Angeles County Tax Collector 225 N. Hill Street # 1 Los Angeles, CA 90012

SHULMAN BASTIAN FRIEDMAN & **BUILLP** Ryan D. O'Dea 100 Spectrum Center Drive, Ste. 600 Irvine, CA 92618

Armen Topachikyan 11605 Kagel Canyon St. Sylmar, CA 91342

Case 2:21-bk-18205-DS Doc 144 Filed 03/08/22 Entered 03/08/22 17:26:29 Desc Main Document Page 29 of 34

In re Crestlloyd, LLC Utility Service List File No. 9562

LA DWP Acct: 742-331-2228 Acct: 039-675-3615 PO Box 30808 Los Angeles, CA 90030

City of Los Angeles Department of Water and Power – West LA 1394 S. Sepulveda Los Angeles CA 90025 LA DWP Acet: 742-331-2228 Acet: 039-675-3615 PO Box 515407 Los Angeles, CA 90051-6707

L.A. DWP – Bankruptcy Unit PO Box 51111 Los Angeles, CA 90051 City of Los Angeles Department of Water and Power 111 N. Hope St. Los Angeles CA 90012 Case 2:21-bk-18205-DS Label Matrix for local noticing 0973-2 Case 2:21-bk-18205-DS Central District of California Los Angeles Tue Mar 8 08:49:51 PST 2022

Levene, Neale, Bender, Yoo & Golubchik LLP 2818 La Cienega Avenue Los Angeles, CA 90034-2645

American Truck & Tool Rentals Inc. Tom Murray, CEO and President 88 W. Victoria St. Long Beach, CA 90805-2157

Biabani & Associates, Inc. 1600 Sawtelle Bl #104 Los Angeles, CA 90025-3197

Brunswick Corp. 26125 N. Riverwoods Blvd. Ste 500 Lake Forest, IL 60045-4811

C.G.S. Custom Glass Specialists 4536 Ish Drive Simi Valley, CA 93063-7666

Calgrove Rentals Inc. Guadalupe Gomez, President 456 Glenoaks Blvd. San Fernando, CA 91340-1833

Centurion Air, LLC 13932 Arrow Creek Road Draper, UT 84020-9295

Compass Aaron Kirman 9378 Wilshire Blvd. #200 Beverly Hills, CA 90212-3167

County of Los Angeles MRCA-Brush Fire Clear q Dist #1 200 North Main Street, 16th Fl Los Angeles, CA 90012-4110

Doc 144 Filed 03/08/22 Entered 03/08/22 17:26:29 D Manipuborument Page 30 of 34 c/o SierraConstellation Partners LLC 355 S. Grand Avenue Suite 1450 Los Angeles, CA 90071-3152

Los Angeles Division 255 East Temple Street, Los Angeles, CA 90012-3332

BMC West LLC 3250 N. San Fernando Rd. Los Angeles, CA 90065-1415

Bradford Sheet Metal 4164 Sopp Road Mojave, CA 93501-7196

Brutzkus Gubner David Seror 21650 Oxnard St., Suite 500 Woodland Hills, CA 91367-4911

CAD Stone Works Inc. 4533 Van Nuys Bl. #201 Sherman Oaks, CA 91403-2950

Caprenos Inc. Cindee Wood Authorized Agent 4345 Murphy Canyon Road #200 San Diego, CA 92123-4362

City of Los Angeles Mike Feuer, City Attorney City Hall East, Suite 800 Los Angeles, CA 90012

Conejo Recreation and Park District 403 W. Hillcrest Drive Thousand Oaks, CA 91360-4223

County of Los Angeles Wildlife Corridor and Protection 4745 Mangels Blvd. Fairfield, CA 94534-4175

4-95 Kandaher, Mont Tremblant Ouebec Canada

Alvandi Law Group, P.C. Gil Alvandi 2955 Main St. Suite 110 Irvine, CA 92614-2527

BMC West LLC David Filtman, CEO 4800 Falls of Neuse Rd., Ste. 400 Raleigh, NC 27609-8142

Branden Williams 257 N. Cannon Dr., 2nd Fl. Beverly Hills, CA 90210-4361

Buchalter, APC Jeffrey S. Wruble 1000 Wilshire Blvd., Suite 1500 Los Angeles, CA 90017-1730

Calgrove Rentals Inc. 21627 Roscoe Bl. Canoga Park, CA 91304-4159

Carcassone Fine Homes, LLC c/o Hamid R. Rafatjoo 1800 Avenue of the Stars, 12th Fl. Los Angeles, CA 90067-4201

Clerk of the Governing Board, Mount. Rec. & Cons. Auth. 5750 Ramirez Canyon Malibu, CA 90265-4474

County of Los Angeles Local Fire Prevention Measure 4745 Mangels Blvd. Fairfield, CA 94534-4175

Creative Art Partners 6542 Hayes Dr. Los Angeles, CA 90048-5320

Case 2:21-bk-18205-DS Crest Real Estate 11150 Olympic Bl. #700 Los Angeles, CA 90064-1825

Doc 144 Filed 03/08/22 Entered 03/08/22 17:26:29 Desc Main Declurient Page 31 of 34 Wolf, Rifkin, Shapiro, et al. 11400 W. Olympic Blvd., 9th Fl. Los Angeles, CA 90064-1582

Davidson Accountancy Corp. William N. Davidson, CPA 14011 Ventura Blvd., Ste. 302 Sherman Oaks, CA 91423-5226

Dennis Palma 146 Beach Way Monterey, CA 93940-3436

Department of Water and Power, City of Los Angeles Attn: Bankruptcy P. 0. Box 51111 Los Angeles, CA 90051-5700

Draken Private Security Jaime Salanga 633 West 5th St. Los Angeles, CA 90071-2005

Draken Security 8225 Encino Ave Northridge, CA 91325-4313

Employment Development Dept. Bankruptcy Group MIC 92E P.O. Box 826880 Sacramento, CA 94280-0001

FRANCHISE TAX BOARD BANKRUPTCY SECTION MS A340 PO BOX 2952 SACRAMENTO CA 95812-2952

Franchise Tax Board Bankruptcy Section, MS: A-340 P.O. Box 2952 Sacramento, CA 95812-2952

Frontier Communications Corporation 401 Merritt 7 Norwalk, CT 06851-1069

Hankey Capital, LLC Attn: Eugene M. Leydiker 4751 Wilshire Blvd. #110 Los Angeles, CA 90010-3838

Hilldun Corporation Jeffrey D. Kapelman, CEO 225 West 35th St. New York, NY 10001-1910

Hilldun Corporation c/o Brutzkus Gubner Attn: Jerrold L Bregman 5445 DTC Parkway Ste 825 Denver CO 80111-3190

Hilton & Hyland Real Estate 257 North Ca on Drive Beverly Hills, CA 90210-4361

Inferno Investment Inc. Julien Remillard, President 4-95 Kandahar, Mont Tremblant Quebec J8E 1E2 Canada

Inferno Investment, Inc. c/o Smiley Wang-Ekvall, LLP 3200 Park Center Drive, Suite 250 Costa Mesa, CA 92626-7234

Internal Revenue Service P.O. Box 7346 Philadelphia, PA 19101-7346

Italian Luxury Design 4 NE 39 St. Miami, FL 33137-3630

Italian Luxury Group, LLC c/o Gregory J. Morrow, Esq. 10401 Wilshire Boulevard, Suite 1102 Los Angeles, CA 90024-4609

J&E Texture, Inc. Francisco Gonzalez, CEO 181 Exeter Way Corona, CA 92882-8502

JMBM LLP Neil C. Erickson 1900 Avenue of the Stars, 7th Fl. Los Angeles, CA 90067-4308

JMS Air Conditioning and Appliance Services, Inc. 7640 Burnet Ave. Van Nuys, CA 91405-1005

JOHN A. BELCHER 150 E. COLORADO BLVD., SUITE 215 PASADENA, CA 91105-3758

Jabs Pools and Spas, LLC 8055 Matilija Ave. Panorma City, CA 91402-6126

Jesus Agudelo aka Jesus Columbia 944 Airole Way Los Angeles, CA 90077-2602

Jose Napoleon Garcia 1525 N. Detroit St., #5 Los Angeles, CA 90046-3233

KN Coating 201 E. Tamarack Ave Inglewood, CA 90301-2714

Kazemi & Associates Constructors 11901 Santa Monica Blvd #800 Los Angeles, CA 90025-2767

Kennco Plumbing, Inc. Robert L. Kennedy, Jr., CEO 21366 Placerita Canyon Rd. Newhall, CA 91321-1846

Case 2:21-bk-18205-DS Kennco Plumbing, Inc. Robert L. Kennedy, Jr., CEO 26575 Ruether Ave. Santa Clarita, CA 91350-2622

Doc 144 Filed 03/08/22 Entered 03/08/22 17:26:29
Main Document Page 32 of 34
P.O. Box. 30808
Los Angeles, CA 90030-0808
Entered 03/08/22 17:26:29
Lanes Management Serv
Theodore Lanes
655 Deep Valley Drive

8/22 17:20:29 DESC Lanes Management Services
Theodore Lanes
655 Deep Valley Drive 125-P
Palos Verdes Peninsula, CA 90274-3615

(p)LOS ANGELES COUNTY TREASURER AND TAX COLLE ATTN BANKRUPTCY UNIT PO BOX 54110 LOS ANGELES CA 90054-0110 Made by TSI, Inc. 1840 Jefferson Ave., Apt 303 Miami Beach, FL 33139-2461 Made by TSI, Inc. 888 Biscayne Blvd #209 Miami, FL 33132-1588

Martin Aguirre 112 1/2 North 20th St. Montebello, CA 90640-4041 Martin Aguirre c/o Nathan D. McMurry 8050 N. Palm Ave. Ste. 300 Fresno, CA 93711-5510 Michael Pyle LLC dba Centurion LV 13932 Arrow Creek Rd Draper, UT 84020-9295

Midland Contractors, Inc. Po Box 8312 Van Nuys, CA 91409-8312 Mike Fields Bronzes LLC 2715 E 36th Ave Apt 6203 Spokane, WA 99223-4593 Moises Lopez 141 S. Ave. 55 Apt. 40 Los Angeles, CA 90042-4635

Nile Niami c/o Hamid R. Rafatjoo 1800 Avenue of the Stars, 12th Fl. Los Angeles, CA 90067-4201 Parker Resnik Structural Engineering 1927 Pontius Ave Los Angeles, CA 90025-5611 Parquet by Dian Dima Efros, CEO 16601 S. Main Street Gardena, CA 90248-2722

Plus Development Group 743 Seward St. Los Angeles, CA 90038-3566 Powertek Electric Inc. Mike Moshrefi, CEO 28364 S. Western Ave. # 414 Rancho Palos Verdes, CA 90275-1434 Powertek Electric, Inc. Hart Kienle Pentecost 4 Hutton Centre Drive, Suite 900 Santa Ana, CA 92707 Santa Ana, CA 92707-8713

Pro-Pest, Inc. P.O. Box 3868 Valley Village, CA 91617-3868 Public Insurance Agency Inc. 10941 W. Pico Bl. Los Angeles, CA 90064-2117 Public Occurrences, LLC 15821 Ventura Blvd. #265 Encino, CA 91436-2941

Rolls Scaffold, Inc. Michael Rolls, CEO 11351 County Dr. Ste B Ventura, CA 93004-3559 SHULMAN BASTIAN FRIEDMAN & BUI LLP Ryan D. O'Dea 100 Spectrum Center Drive, Ste. 600 Irvine, CA 92618-4969 Santos Gerardina Garcia 509 Union Drive Apt. #206 Los Angeles, CA 90017-1526

Showroom Interiors LLC 8905 Rex Road Pico Rivera, CA 90660-3799 SierraConstellation Partners LLC 355 S. Grand Avenue, Suite 1450 Los Angeles, CA 90071-3152 (p) CALIFORNIA STATE BOARD OF EQUALIZATION ACCOUNT REFERENCE GROUP MIC 29 P O BOX 942879 SACRAMENTO CA 94279-0029

The Beverly Hills Estates, Inc. Branden Williams 8878 Sunset Blvd., West West Hollywood, CA 90069-2108 The Vertex Companies, Inc. 12100 Wilshire Blvd 8th floor Los Angeles, CA 90025-7120 The Vertex Companies, Inc. 147 W. 35th St., 19th Fl. Long Island City, NY 11101 Case 2:21-bk-18205-DS The Vertex Companies, Inc. 400 Libbey Parkway Weymouth MA 02189-3134 Doc 144 Filed 03/08/22 Entered Whiti Major On Incertion Inc Page 33 of 34 8033 West Sunset Blvd. #569
Los Angeles, CA 90046-2401

Entered 03/08/22 17:26:29 Desc 3 of 34 United Specialty Insurance Co. 1900 L Don Dodson Drive Bedford, TX 76021-5990

United States Trustee (LA) 915 Wilshire Blvd, Suite 1850 Los Angeles, CA 90017-3560 Universal Television, LLC 100 Universal City Plaza Universal City, CA 91608-1002 Vesta aka Showroom Interiors, LLC 8905 Rex Road Pico Rivera, CA 90660-3799

Vista Sotheby's Int'l. Realty Chris Adlam 16 Malaga Cove Plaza Palos Verdes Peninsula, CA 90274-1306 West Coast Gates 339 Isis Ave. Inglewood, CA 90301-2007 West Valley Green Landscaping, Inc. 14761 Tupper St. Panorama City, CA 91402-1222

Westcoast Gate & Entry Systems, LLC 339 Isis Ave Inglewood CA 90301-2007 Westside Estate Agency Kurt Rappaport 210 North Canon Dr. Beverly Hills, CA 90210-5302 YOGI Securities Holdings, LLC Steve Oshins, Auth. Agent 1645 Village Center Cir., Ste. 170 Las Vegas, NV 89134-6371

Yaly Martinez Arrazola 11804 Kiowa Avenue Apt 4 Los Angeles, CA 90049-6024 Yvonne Niami 301 Copa de Oro Road Los Angeles, CA 90077-3822 David B Golubchik Levene, Neale, Bender, Yoo & Golubchik L 2818 La Cienega Avenue Los Angeles, CA 90034-2645

Lindsey L Smith Levene, Neale, Bender, Yoo & Golubchik 2818 La Cienega Ave Los Angeles, CA 90034-2645 Todd M Arnold Levene, Neale, Bender, Yoo & Golubchik L 2818 La Cienega Avenue Los Angeles, CA 90034-2645

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

Los Angeles County Tax Collector 225 N. Hill Street # 1 Los Angeles, CA 90012 (d)Los Angeles County Treasurer and Tax Colle Attn: Bankruptcy Unit PO Box 54110 Los Angeles, CA 90054-0110 State Board of Equalization Acct. Analysis & Control MIC 29 POB 942879 Sacramento, CA 94279

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u) Concierge Auctions, LLC

(u) Courtesy (NEF)

(u) Hilldun Corporation

Case 2:21-bk-18205-DS Doc 144 Filed 03/08/22 Entered 03/08/22 17:26:29 Desc (u) Inferno Investment, Inc. Wall Document Page 34 of 34 (u) The Beverly Hills Estate and Compass

(u) Yogi Securities Holdings, LLC

(u) Simone Giovanni Cenedese

(u) Andre Mario Smith

Murano s.a.s

Calle Bertolini, 6, Murano, Venezia

(u) Edward Roark Schwagerl

(u) Theodore Lanes

End of Label Matrix
Mailable recipients 106
Bypassed recipients 11
Total 117